

EXHIBIT 14

*WINDSOR SECURITIES, LLC VS.
ARENT FOX LLP, et al.*

*LAUREN ANTONINO
February 15, 2018*



126 East 56th Street, Fifth Floor New York, New York 10022

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Original File 116472.TXT

Min-U-Script® with Word Index

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 -----X
WINDSOR SECURITIES, LLC,

4 Plaintiff,

5 vs.

6 ARENT FOX LLP, et al.,

7 Defendants,

8 CIVIL ACTION NO. 16-CV-01533 (GBD) (GWG)

9 -----X

10 303 Peachtree Street NE
11 Atlanta, Georgia

12 February 15, 2018
11:03 a.m.

13
14 Videotaped deposition of LAUREN ANTONINO, taken
15 on behalf of the Defendants, pursuant to Notice and
16 agreement of counsel, in accordance with the Federal
17 Rules of Civil Procedure, before Maureen S. Kreimer,
18 CCR B-1379, CRR, Notary Public, at the law offices
19 of Hawkins Parnell.
20
21
22

23 ELLEN GRAUER COURT REPORTING CO. LLC
24 126 East 56th Street, Fifth Floor
New York, New York 10022
212.750.6434
25 REF: 116472

1 A P P E A R A N C E S :

2

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4 On behalf of the Plaintiff

5 135 Old York Road

6 Jenkintown, Pennsylvania 19046

7 BY: ALAN L. FRANK, ESQ.

8 215.935.1000

9

10 Foley & Lardner, LLP

11 On behalf of the Defendants

12 90 Park Avenue

13 New York, New York 10016

14 BY: PETER N. WANG, ESQ.

15 ADAM G. PENCE

16 212.682.7474

17

18 Hawkins Parnell Thackston & Young LLP

19 On behalf of the Witness

20 303 Peachtree Street NE

21 Suite 4000

22 Atlanta, Georgia 30308-3243

23 BY: CHRISTINE L. MAST, ESQ.

24 404.614.7400

25

1 A P P E A R A N C E S : (Cont'd)

2

3 ALSO PRESENT:

4 Mr. Henry Stewart, Videographer

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1 ----- I N D E X -----

2 WITNESS EXAMINATION BY PAGE

3 LAUREN ANTONINO MR. WANG 7

4

5

6 ----- E X H I B I T S -----

7 DEFENDANTS' DESCRIPTION FOR I.D.

8 Exhibit 1 Affidavit of Lauren S. 38

9 Antonino

10 Exhibit 2 Subpoena to Lauren 48

11 Antonino to produce

12 documents

13 Exhibit 3 Billing reports from 69

14 Antonino firm

15 Plaintiff-069455 - 9601

16 Exhibit 4 Confidential submission by 80

17 Windsor Securities LLC via

18 email to Wayne Thorpe

19 Antonino-083440 - 3460

20 Exhibit 5 Email string ending 123

21 8-30-16 Subject Attorney

22 Invoices; Plaintiff-084552

23 - 4553

24

25

----- E X H I B I T S (Cont'd) -----		
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Exhibit 6	Tolling Agreement signed	142
	2-13-15 Antonino-016421 -	
	6424	
Exhibit 7	2-23-16 Letter from Marcus	148
	Law Office to Steve Prusky	
	Antonino-016416	
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	Claims Plaintiff-087010	
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	Affidavit Plaintiff-072806	
	- 2811	
Exhibit 10	Email string ending	168
	8-29-14 Subject Barnes/	
	Bitter Policy Revised	
	Settlement, CONFIDENTIAL	
	Plaintiff-008243 - 8251	

(EXHIBITS TO BE PRODUCED)

1 ANTONIO

2 MS. MAST: You see what I'm saying?

3 MR. WANG: I don't see what you mean. But
4 we'll get to the affidavit, and then I'll ask
5 specific questions in the context of the
6 affidavit.

7 MS. MAST: Okay.

8 MR. WANG: Maybe that will help this
9 along.

10 MS. MAST: Okay.

11 BY MR. WANG:

12 Q. Ms. Antonino, had you, prior to your
13 working for Windsor, being retained by Windsor, had
14 you had any experience in premium financing for life
15 insurance policies?

16 A. No.

17 Q. Had you had any experience in litigation
18 involving premium financing for life insurance
19 products?

20 A. I had experience involving insurance
21 coverage disputes, but not specifically life
22 insurance premium financing.

23 Q. What sorts of insurance coverage disputes
24 had you had experience in?

25 A. Disputes over who's entitled to the death

1 ANTONIO

2 don't know if it was exactly before or after when I
3 started working with Windsor, but it could been
4 before. Yeah, I -- there is one that I'm thinking
5 of particularly. So I don't know exactly the
6 timing.

7 Q. So you're thinking of one in particular
8 that happened fairly recent to the Windsor
9 experience, either before or after?

10 A. I think so.

11 Q. Mm-hmm (affirmative).

12 A. I hadn't thought about it in a while, but
13 yes.

14 Q. Okay. And how about life settlement?
15 The -- you know what the life settlement industry
16 is, you know what that --

17 A. Yes. I had not been involved in the life
18 settlement industry before.

19 Q. You had not?

20 A. No, sir.

21 Q. And I think you said you had not been
22 involved in any case involving premium financing;
23 correct?

24 A. Yes.

25 Q. You know what premium financing is?

1 ANTONIO

2 at and give some advice on eventually. This is way
3 late in the game.

4 Q. Mm-hmm (affirmative).

5 A. So it depends on how you define "matter".
6 And there were a variety of things between 2014
7 until the -- you know, until now.

8 Q. Okay. So on each time that you worked on,
9 whether it was the Utah matter, or the Canada
10 matter, did you open a different billing matter
11 number for that?

12 A. No. It was really general representation.
13 I was retained to evaluate whether or not there were
14 claims against Gene Houchins and that group. And
15 that was the scope, by definition of my engagement,
16 specifically in my engagement letter in the outset.
17 That was the only reason that I was retained.
18 That's why your client called me.

19 And in connection with evaluating the
20 potential claims against Mr. Houchins, I was sent a
21 whole lot of information about a whole lot of things
22 so that I could understand what happened.

23 And then it wasn't until May or June of
24 2015 that I was expressly asked to become involved
25 in, you know, other matters, and so I had a revised

1 ANTONIO

2 engagement letter for that. I think my affidavit
3 speaks to that, and which had its own limited scope.

4 And then, you know, after that it was a
5 relationship and, you know, occasionally I was asked
6 to look at some other things.

7 So late in the relationship because the
8 premium financing cases, you know, the -- were --
9 the California cases that Darin were handling were I
10 think maybe over then -- I'm not sure really, I'd
11 have to look at my bills -- and we had decided along
12 the way not to sue Houchins.

13 When I started doing some other things, I
14 did at the end start noting what they were, you
15 know, if they were specific for a specific something
16 else, like the Canada matter, or you know, what you
17 guys are doing.

18 MR. FRANK: I'm going to move to strike or
19 limit or somehow address some of the answer --
20 I didn't want to interrupt it -- to the extent
21 that it implicates what we believe to be
22 attorney-client privileged topics and, in
23 particular, addressing a decision to sue or not
24 sue Mr. Houchins. The Plaintiff most certainly
25 does not concede his privilege with respect to

1 ANTONIO

2 privilege and violates Judge Gorenstein's
3 order. But I'm not criticizing. I'm just
4 simply --

5 THE WITNESS: No problem.

6 MR. FRANK: -- registering on the record
7 our objection to the content of that question
8 and the answer.

9 BY MR. WANG:

10 Q. Did you meet -- did you ever meet
11 Mr. Houchins?

12 A. No.

13 Q. Did you notice his deposition?

14 A. I know we tried to schedule it. I don't
15 remember if a notice went out or not, so I'd have to
16 look at the folder, at the file.

17 Q. And what -- the case settled before you --
18 before that occurred?

19 A. Yes.

20 Q. So you were going to be -- take his
21 deposition, but the settlement intervened?

22 A. I think in the course of the discovery
23 plan there were communications about taking
24 Houchins' deposition.

25 Q. Okay. You did review his transcript in

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A C K N O W L E D G M E N T

STATE OF)
) ss.:
COUNTY OF)

I, LAUREN ANTONINO, hereby
certify that I have read the transcript of my
testimony taken under oath in my deposition;
that the transcript is a true, complete and
correct record of my testimony, and that the
answers on the record as given by me are true
and correct.

LAUREN ANTONINO

Signed and subscribed to before
me, this _____ day of _____, ____.

Notary Public, State of _____

C E R T I F I C A T E

STATE OF GEORGIA)

:

FULTON COUNTY)

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to the written page under my direction; that the foregoing pages represent a true and correct transcript of the evidence given.

I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I anywise interested in the result of said case. The witness did reserve the right to read and sign the transcript.

This, 27th day of February, 2018.



MAUREEN KREIMER, CCR-B-1379
Notary Public in and for the
State of Georgia. My Commission
Expires August 14, 2020.

NAME OF CASE: WINDSOR SECURITIES VS. ARENT FOX
DATE OF DEPOSITION: February 15, 2018
NAME OF WITNESS: LAUREN ANTONINO

PAGE	LINE	FROM	TO	REASON
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[illegible]

Subscribed and sworn before me

this _____ day of _____, _____.

(Notary Public)

My Commission Expires: